

1 MICHAEL FEUER, City Attorney
2 KATHLEEN A. KENEALY, Chief Assistant City Attorney (SBN 212289)
3 SCOTT MARCUS, Senior Assistant City Attorney (SBN 184980)
4 GABRIEL DERMER, Assistant City Attorney (SBN 229424)
5 FELIX LEBRON, Deputy City Attorney (SBN 232984)
6 **A. PATRICIA URSEA, Deputy City Atty (SBN 221637)**
7 200 N. Main Street, City Hall East, Room 675
8 Los Angeles, CA 90012
9 Telephone (213) 978-7569
10 Facsimile (213) 978-7011
11 Felix.Lebon@lacity.org
12 Patricia.Ursea@lacity.org
13
14 *Attorneys for Defendant, CITY OF LOS ANGELES*

11 **UNITED STATES DISTRICT COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA**

13 JANET GARCIA, GLADYS ZEPEDA,
14 MIRIAM ZAMORA, ALI EL-BEY, PETER
15 DIOCSO JR., MARQUIS ASHLEY, JAMES
16 HAUGABROOK, individuals, KTOWN FOR
17 ALL, an unincorporated association,
18 ASSOCIATION FOR RESPONSIBLE and
19 EQUITABLE PUBLIC SPENDING an
20 unincorporated association,

21 *Plaintiffs,*

22 vs.

23 CITY OF LOS ANGELES, a municipal entity;
24 DOES 1-50,

25 *Defendant(s).*

Case No.: 2:19-cv-6182-DSF-PLA
Assigned to Judge Dale S. Fischer

**DECLARATION OF CHRISTIAN
GUERRERO ISO DEFENDANT
CITY OF LOS ANGELES'
OPPOSITION TO MOTION FOR
PRELIMINARY INJUNCTION**

Concurrently Filed Documents:

- Memorandum of Points & Authorities ISO Opposition
- Declarations ISO Opposition: Dermer, Wong, Pereida, Ramirez, Rankin, Guerrero, Haines, Medina, Banks, Bernal, Rodriguez, Diaz
- Request for Judicial Notice
- Evidentiary Objections

Date: March 30, 2020
Time: 1:30 p.m.
Ctrm: 7D

DECLARATION OF CHRISTIAN GUERRERO

I, CHRISTIAN GUERRERO, hereby declare:

1. I am an Officer with the Los Angeles Police Department ("LAPD"), currently assigned to LAPD Central Bureau's Homeless Outreach and Proactive Engagement ("HOPE") Unit. I have been assigned to the HOPE Unit for over three years and have been an Officer with LAPD since June 2013. I have personal knowledge of the facts contained herein, and if called to testify I could and would do so competently.

2. As a HOPE Officer, I regularly interact with community members who are homeless, including through proactive efforts to identify homeless encampments and engage homeless residents to build relationships, identify needs, and make referrals to services when appropriate. I also provide for the safety and security of other service providers, outreach workers, and Bureau of Sanitation employees, including as needed during cleanups of homeless encampments. I encounter homeless encampments located within the Central Bureau on a near daily basis during the course of performing my duties.

3. Attached as **Exhibits 1-18** are true and correct copies of pictures of homeless encampments located within LAPD Central Bureau, which I took during my shift on March 3, 2020. Specifically, Exhibits 1-18 contain pictures taken on March 3, 2020 at the following locations:

- a. **Exhibit 1** (bates label CTY004143-4145) contains a true and correct copy of three pictures of a homeless encampment located at 3427 Marmion Way, Los Angeles.
- b. **Exhibit 2** (bates label CTY004146-4151) contains a true and correct copy of six pictures of a homeless encampment located at Avenue 49 and east of Figueroa Street.
- c. **Exhibit 3** (bates label CTY004152-4155) contains a true and correct

1 copy of four pictures of a homeless encampment located at Bunker Hill
2 and south of Cesar Chavez Avenue.

- 3 d. **Exhibit 4** (bates label CTY004156-4161) contains a true and correct
4 copy of six pictures of a homeless encampment located at Coronado
5 Street and the Hollywood Freeway underpass.
- 6 e. **Exhibit 5** (bates label CTY004162-4164) contains a true and correct
7 copy of three pictures of a homeless encampment located at Temple
8 Street and Virgil Avenue.
- 9 f. **Exhibit 6** (bates label CTY004165-4166) contains a true and correct
10 copy of two pictures of a homeless encampment located at 300 North
11 Juanita Avenue, Los Angeles.
- 12 g. **Exhibit 7** (bates label CTY004167-4168) contains a true and correct
13 copy of two pictures of a homeless encampment taken at Oakwood
14 Avenue and west of Madison Avenue.
- 15 h. **Exhibit 8** (bates label CTY004169-4172) contains a true and correct
16 copy of four pictures taken at a homeless encampment located at
17 Madison Avenue and south of Oakwood Avenue.
- 18 i. **Exhibit 9** (bates label CTY004173-4175) contains a true and correct
19 copy of three pictures taken at Madison Avenue and north of Beverly
20 Boulevard.
- 21 j. **Exhibit 10** (bates label (CTY004176-4179) contains a true and correct
22 copy of four pictures taken at a homeless encampment located at 10th
23 Street and west of Park View Street.
- 24 k. **Exhibit 11** (bates label (CTY004180-4181) contains a true and correct
25 copy of two pictures taken at a homeless encampment located at 22nd
26 Street and east of Central Avenue.
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- 1 l. **Exhibit 12** (bates label (CTY004182-4184) contains a true and correct
2 copy of three pictures taken at a homeless encampment located at 25th
3 Street and east of Compton Avenue.
- 4 m. **Exhibit 13** (bates label (CTY004185-4188) contains a true and correct
5 copy of four pictures taken at a homeless encampment located at 25th
6 Street and east of Nevin Avenue.
- 7 n. **Exhibit 14** (bates label (CTY004189-4195) contains a true and correct
8 copy of seven pictures taken at a homeless encampment located at 25th
9 Street and west of Long Beach Avenue.
- 10 o. **Exhibit 15** (bates label (CTY004196-4198) contains a true and correct
11 copy of three pictures taken at a homeless encampment located at Adams
12 Boulevard and west of Long Beach Avenue.
- 13 p. **Exhibit 16** (bates label (CTY004199-4201) contains a true and correct
14 copy of three pictures taken at a homeless encampment located at
15 Velasco Street and north of 14th Street.
- 16 q. **Exhibit 17** (bates label (CTY004202) contains a true and correct copy of
17 one picture taken at a homeless encampment located at Pico Boulevard
18 and Concord Street.
- 19 r. **Exhibit 18** (bates label (CTY004203-4208) contains a true and correct
20 copy of six pictures taken at a homeless encampment located at Concord
21 Street and north of Pico Boulevard.
- 22

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24 ///

1 4. Exhibits 1-18 reflect examples of the types of bulky items and property
2 stored in public areas that I have regularly encountered during the course of performing
3 my duties as a HOPE Officer.

4 I declare under penalty of perjury under the laws of the State of California and the
5 United States that the foregoing is true and correct and that this Declaration was executed
6 on March 5, 2020, at Los Angeles, California.

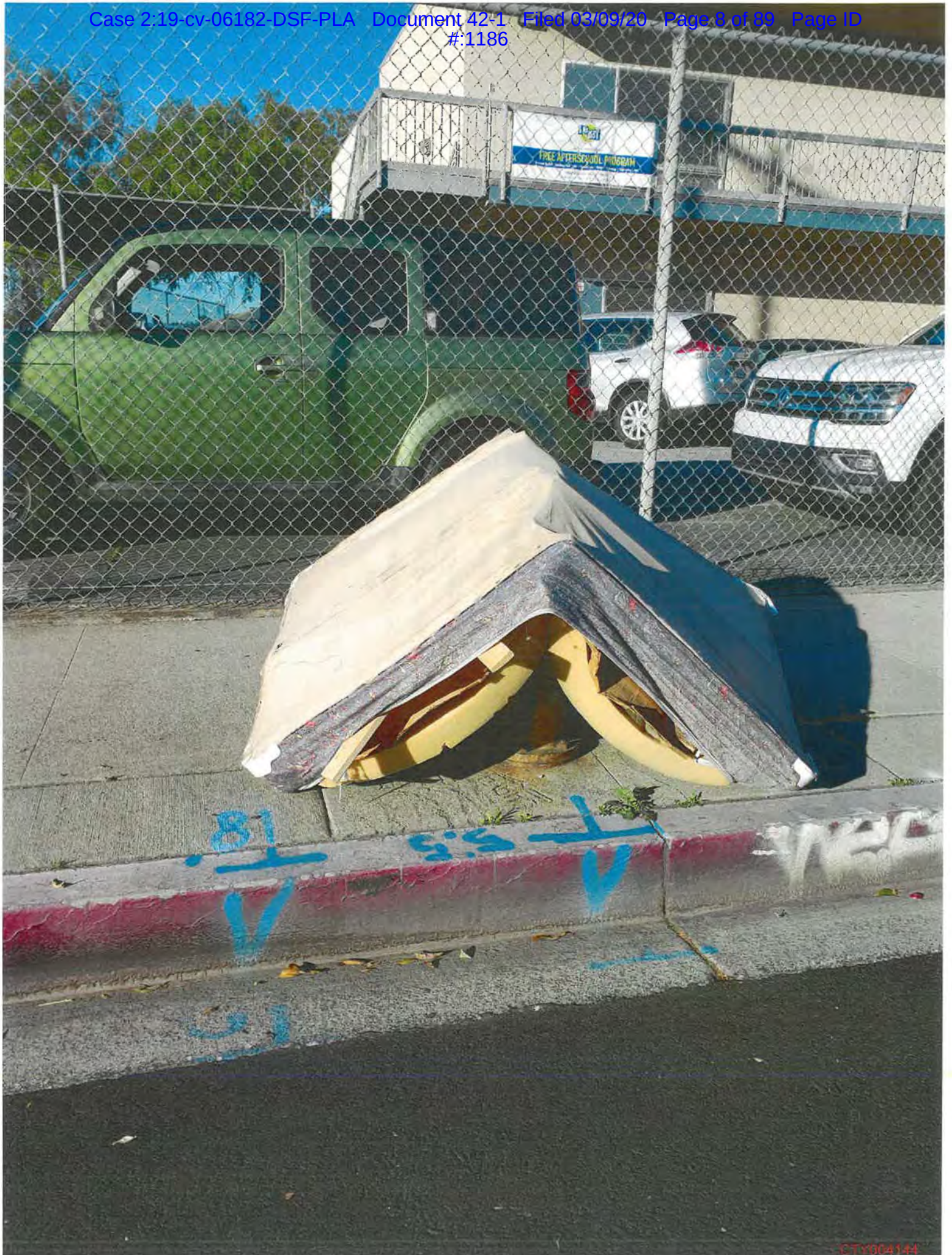
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CHRISTIAN GUERRERO

EXHIBIT 1





CTY004144



Exhibit 2





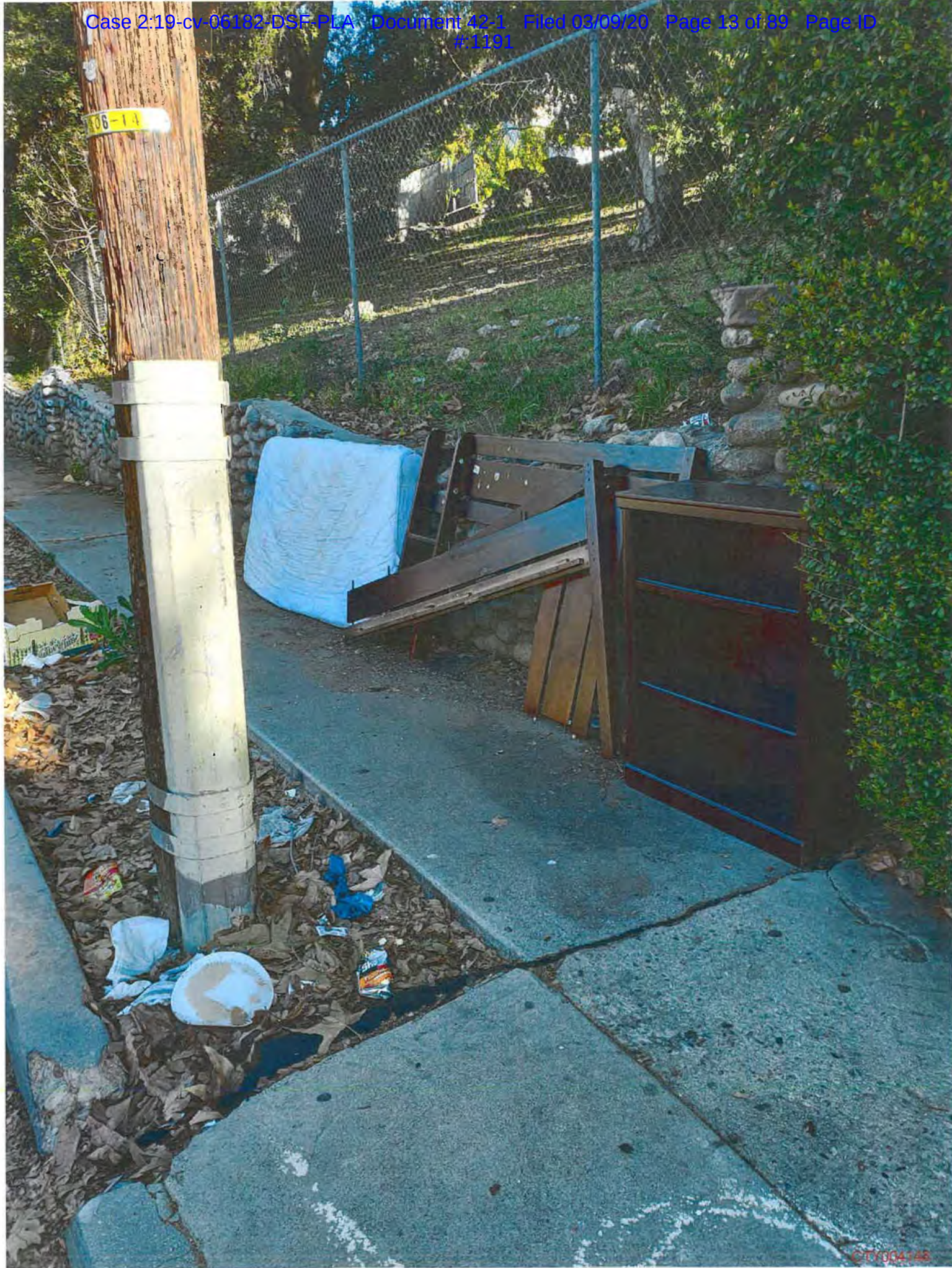








Exhibit 3





CTY004153



CTV004154



CTY004155

EXHIBIT 4



CTV004158



CTY004157



CTY004158







EXHIBIT 5





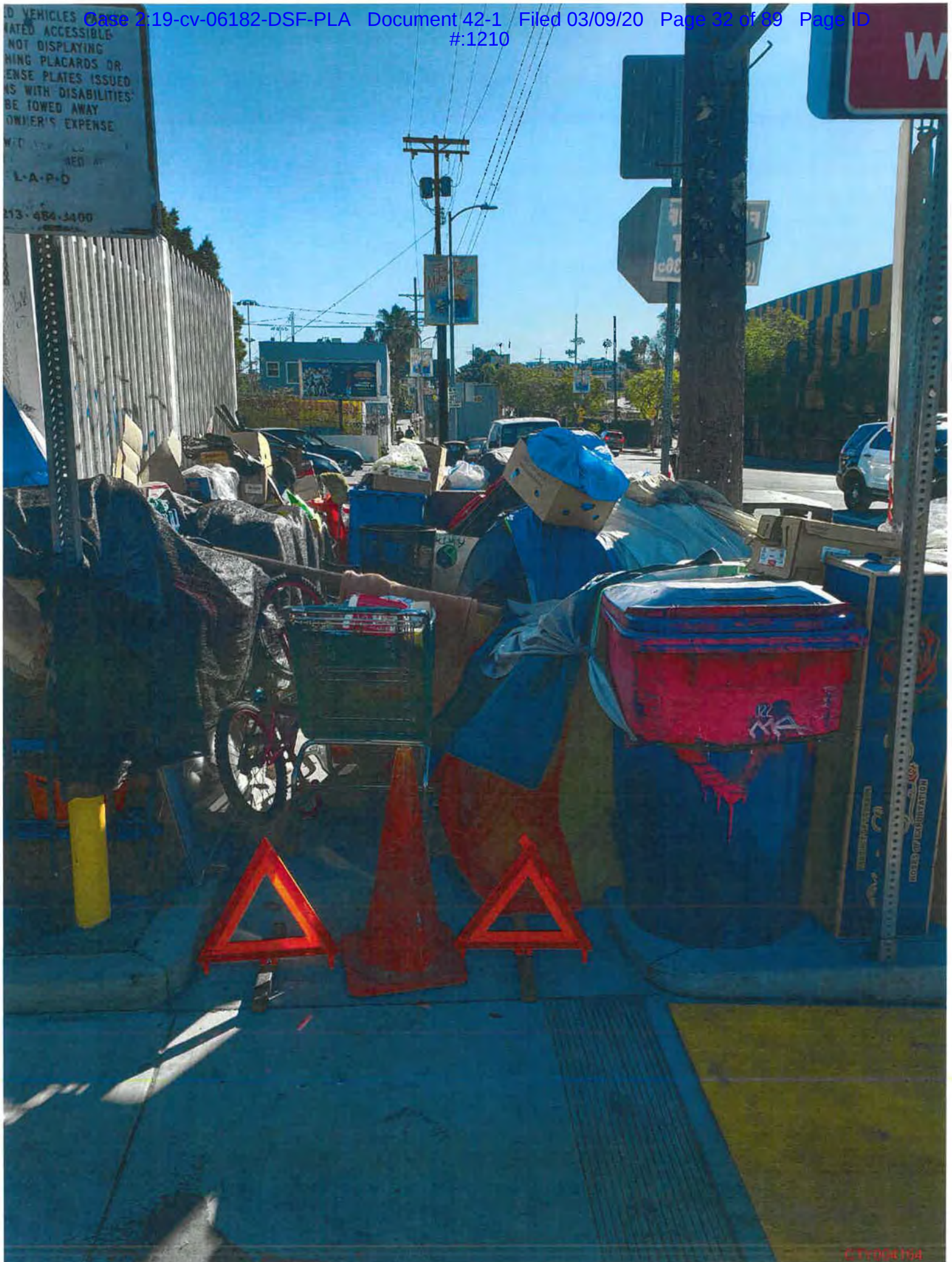


EXHIBIT 6

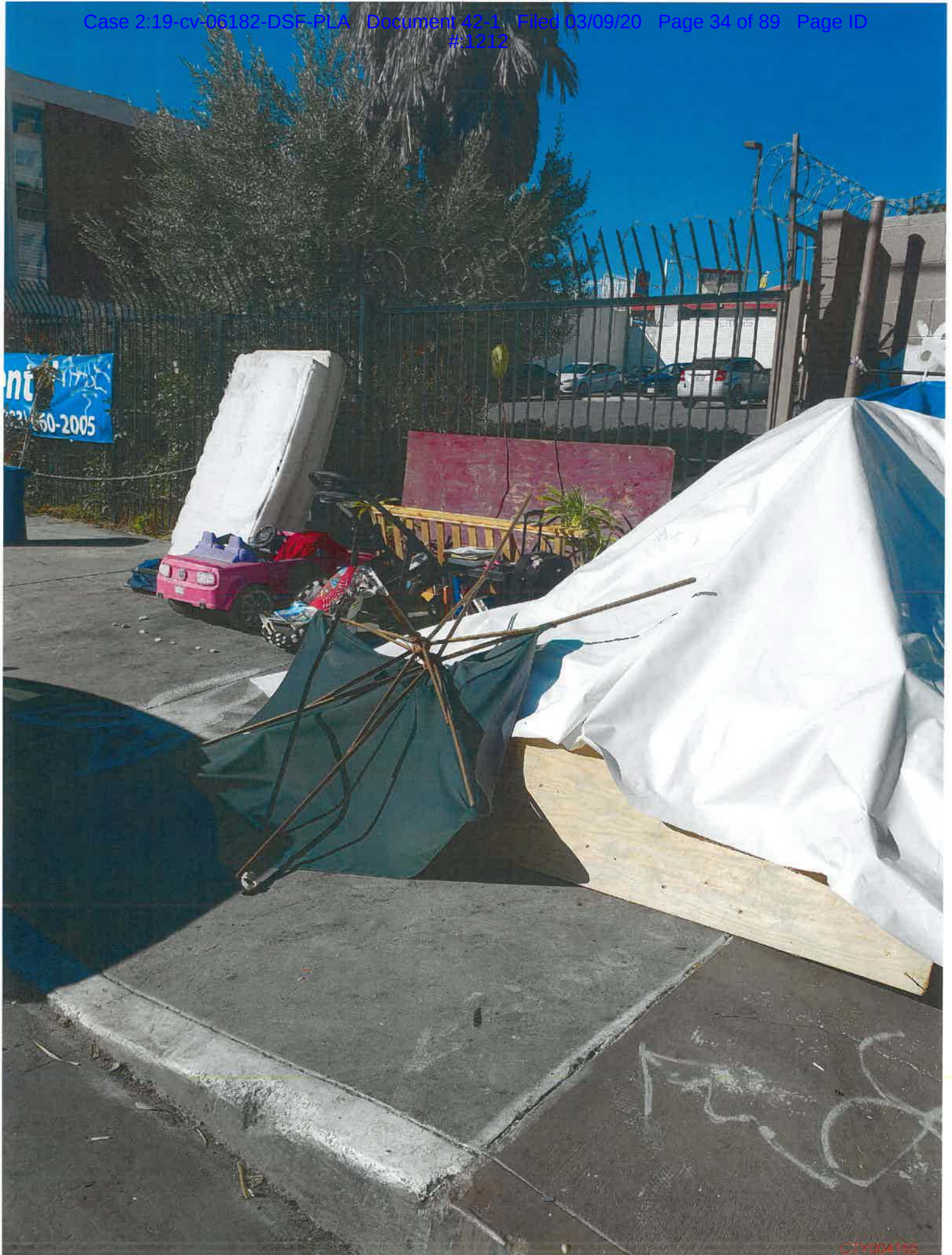
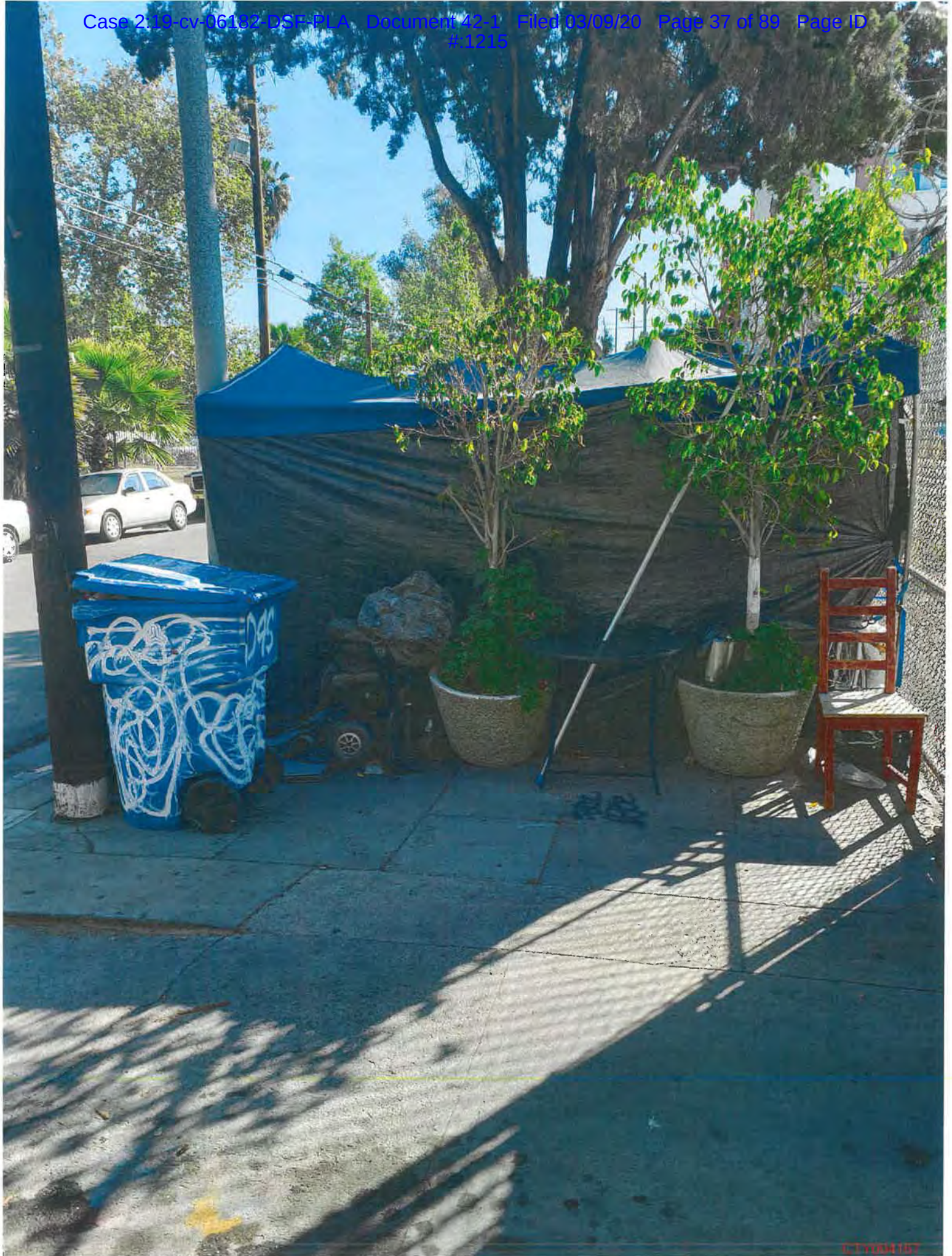
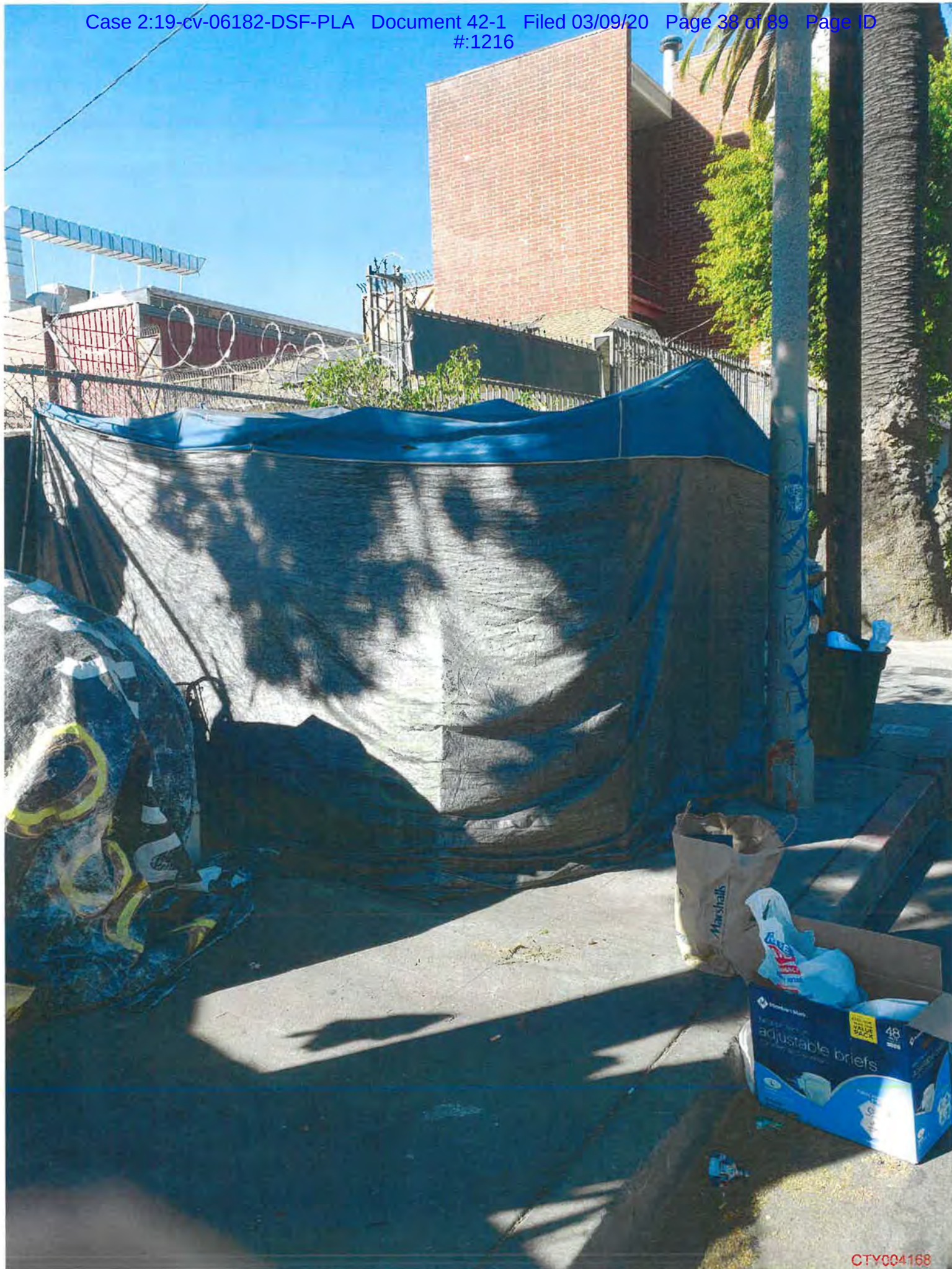




EXHIBIT 7

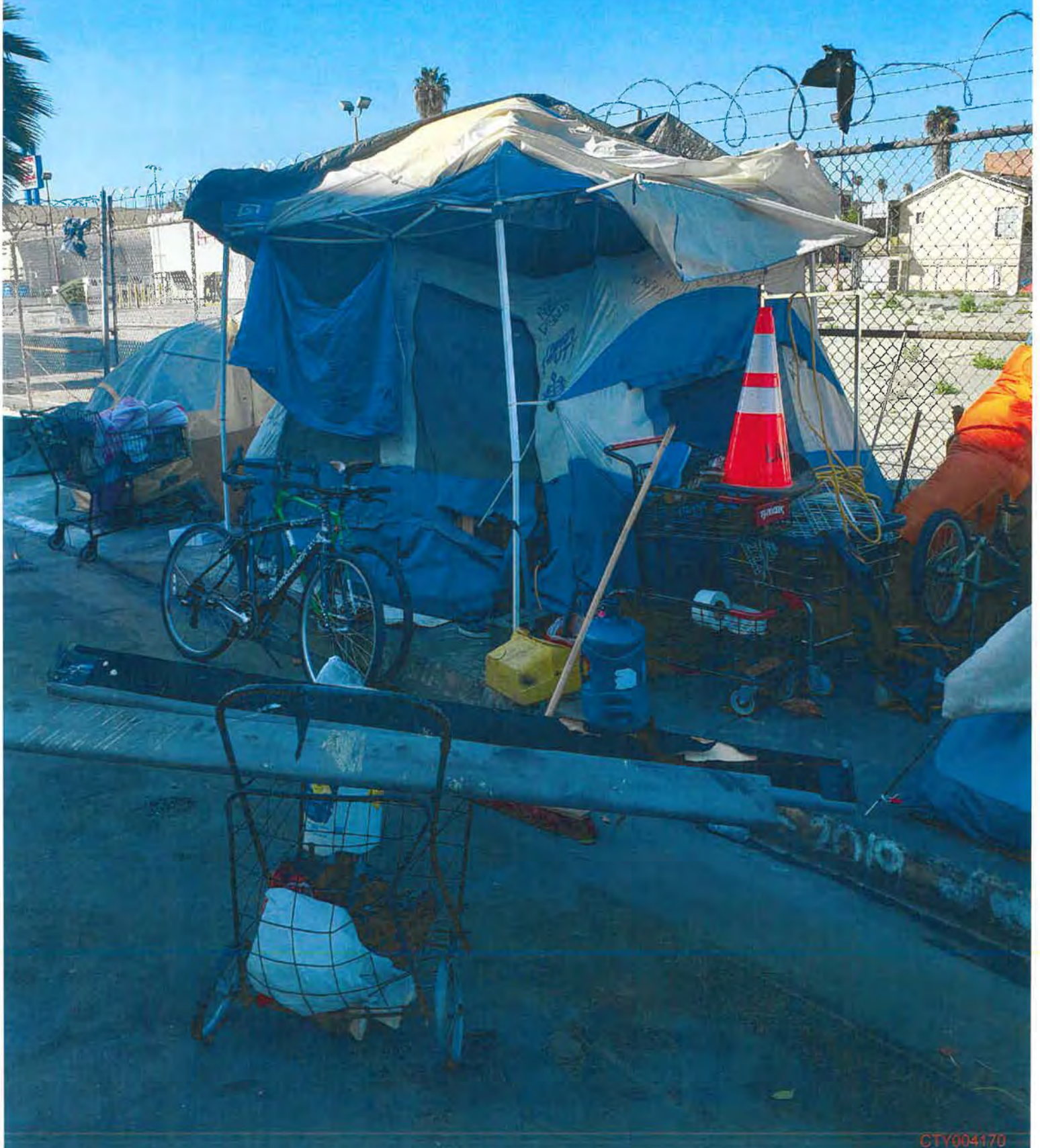




CTY004168

EXHIBIT 8







CTV004171

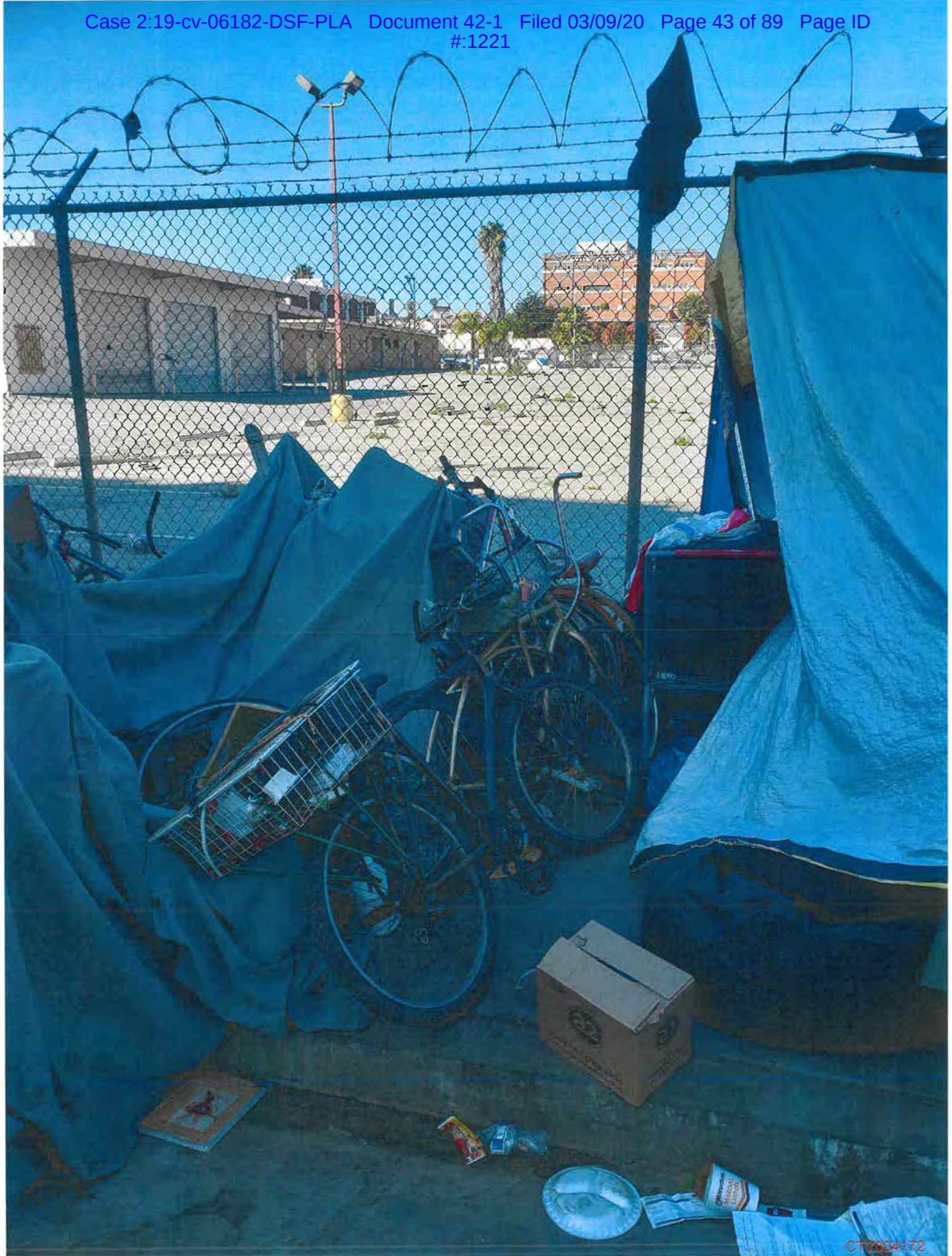


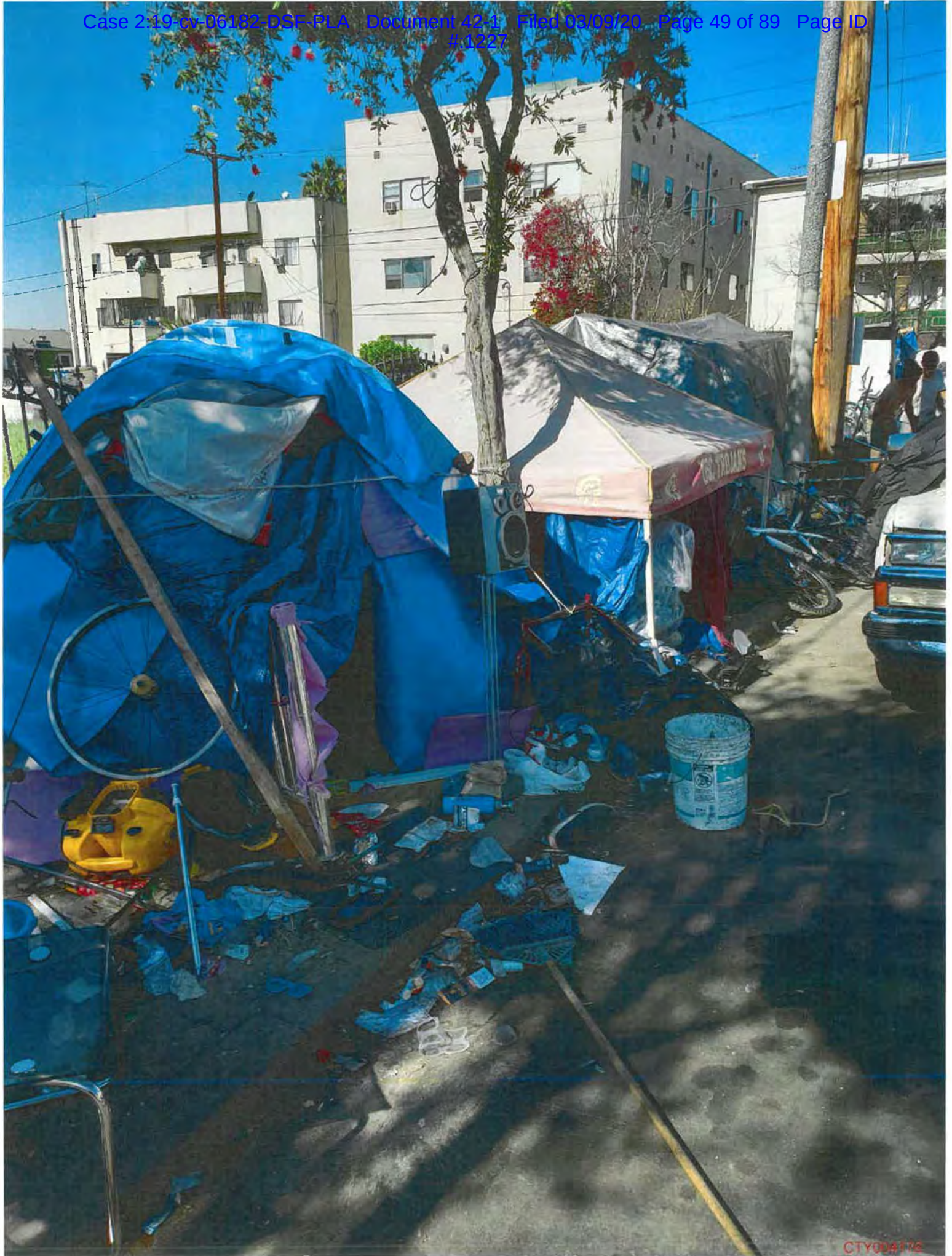
EXHIBIT 9



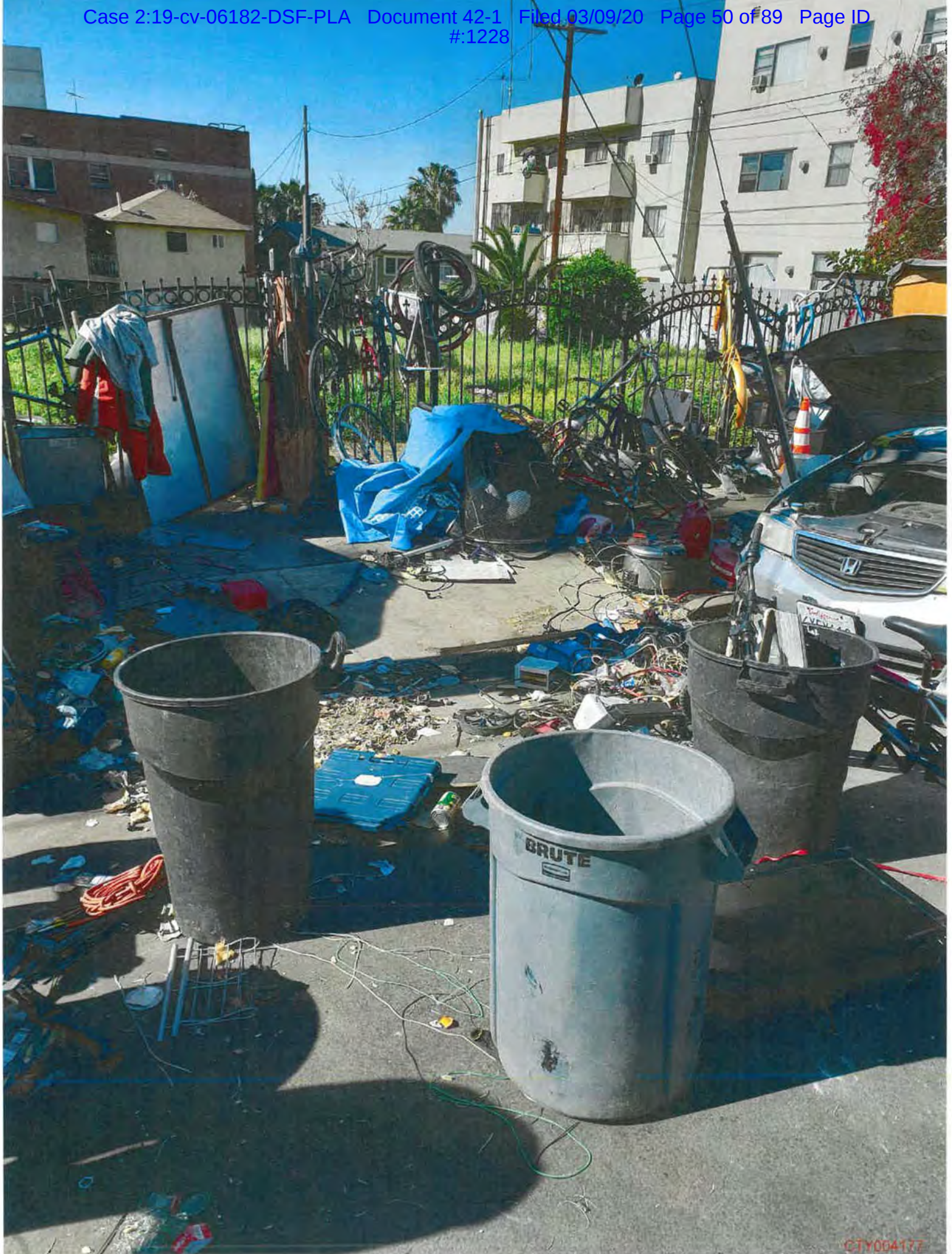




EXHIBIT 10



CTY004176



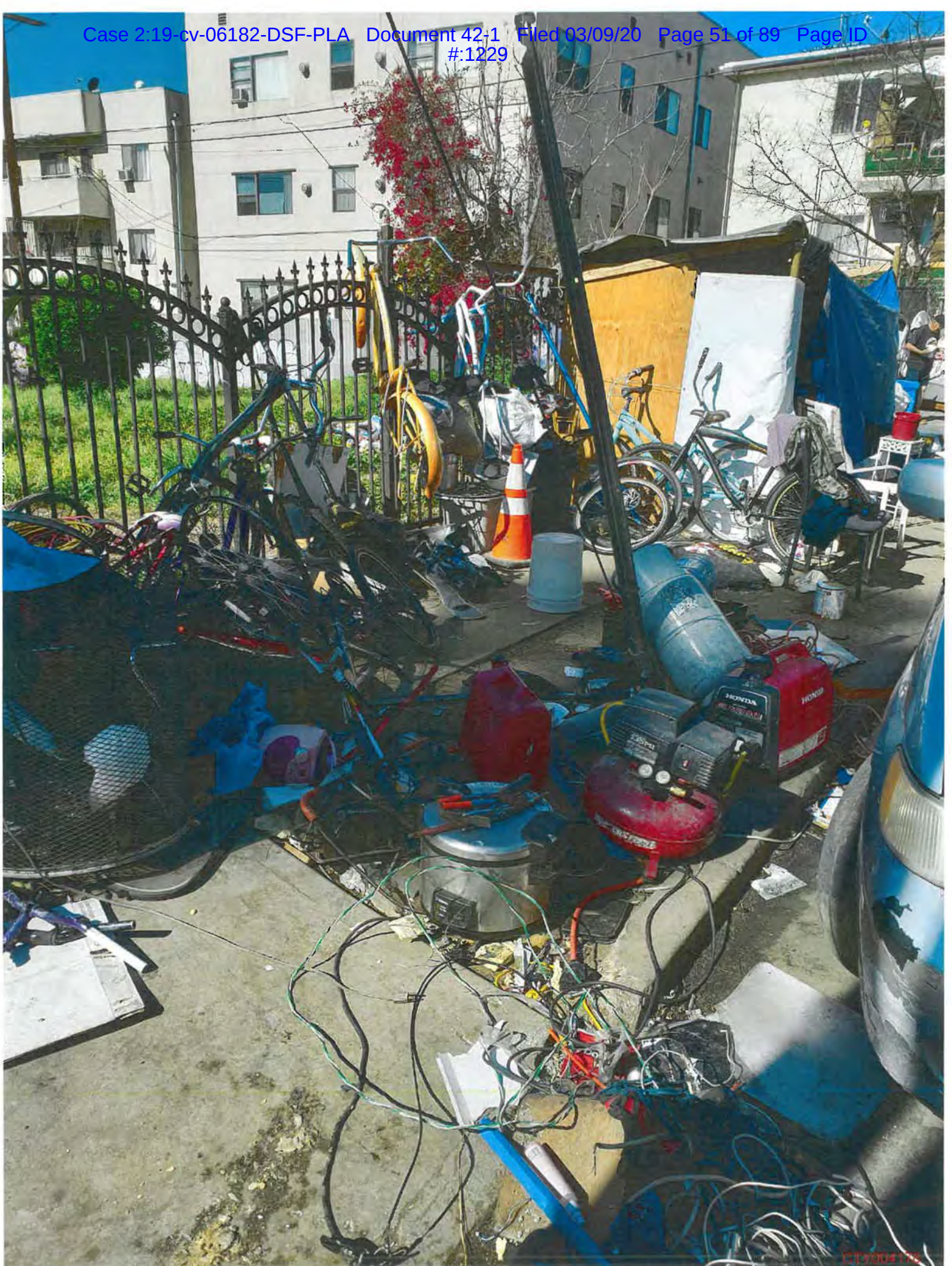




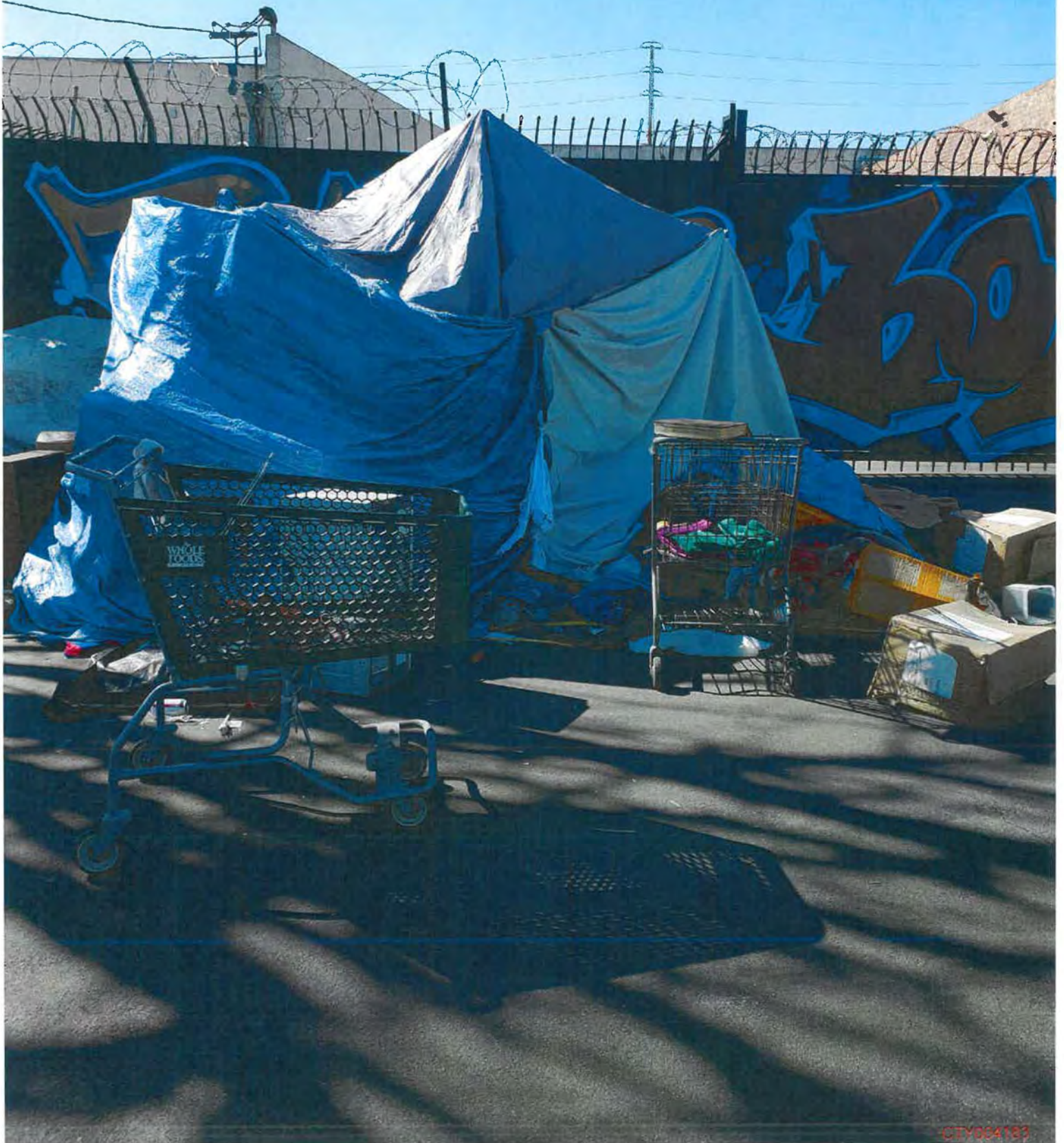
EXHIBIT 11





EXHIBIT 12





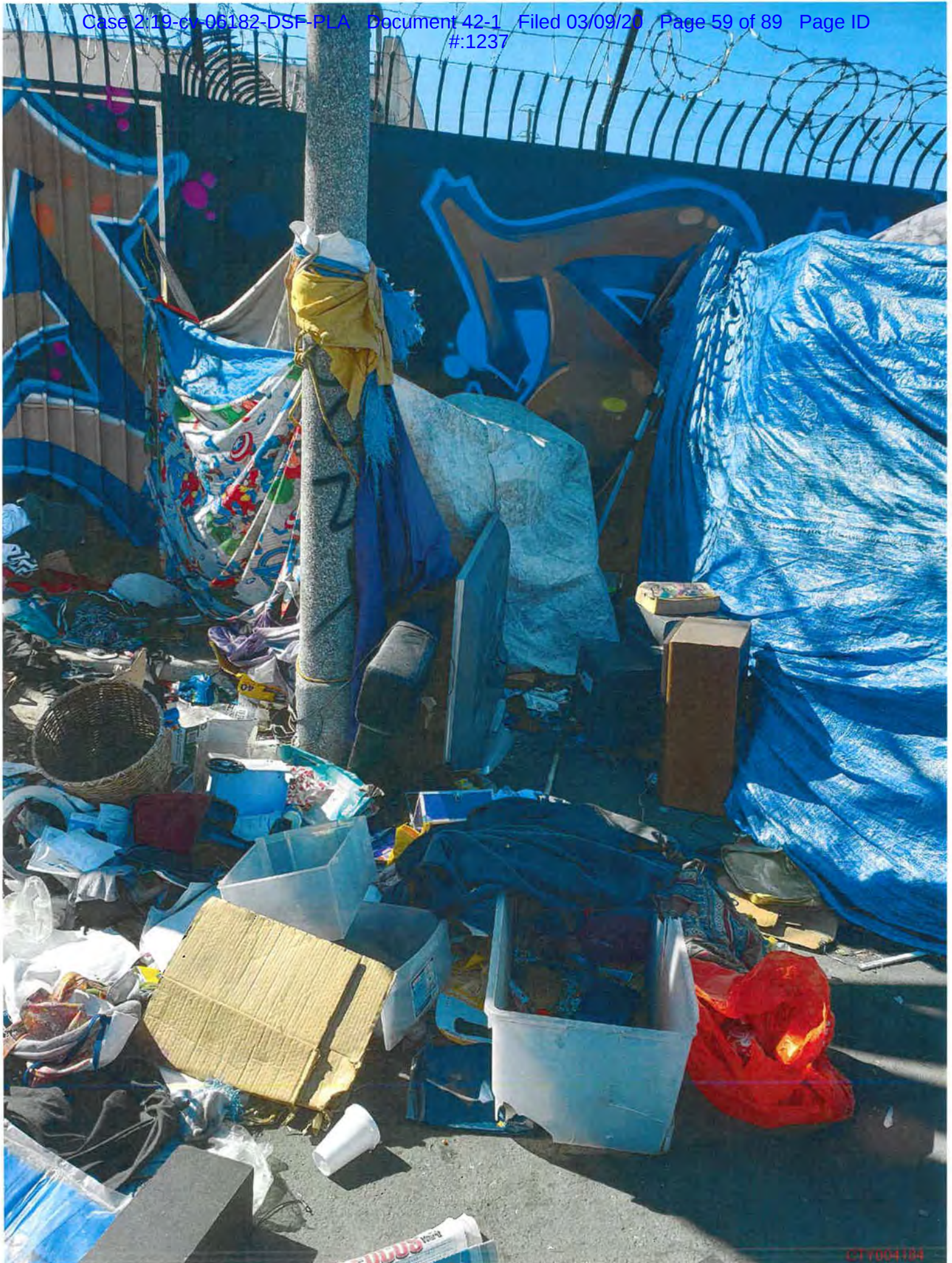


EXHIBIT 13



CT1004185

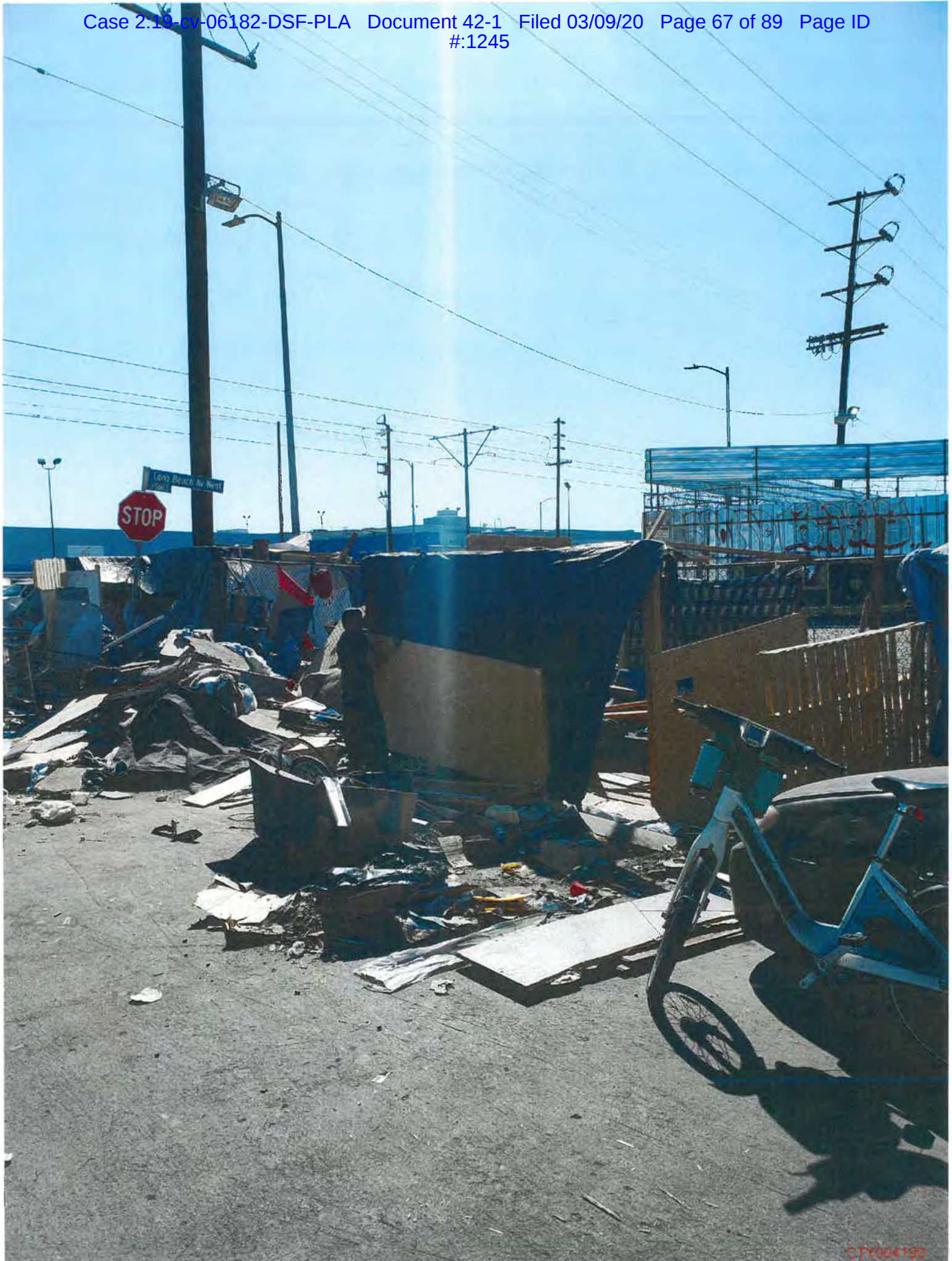


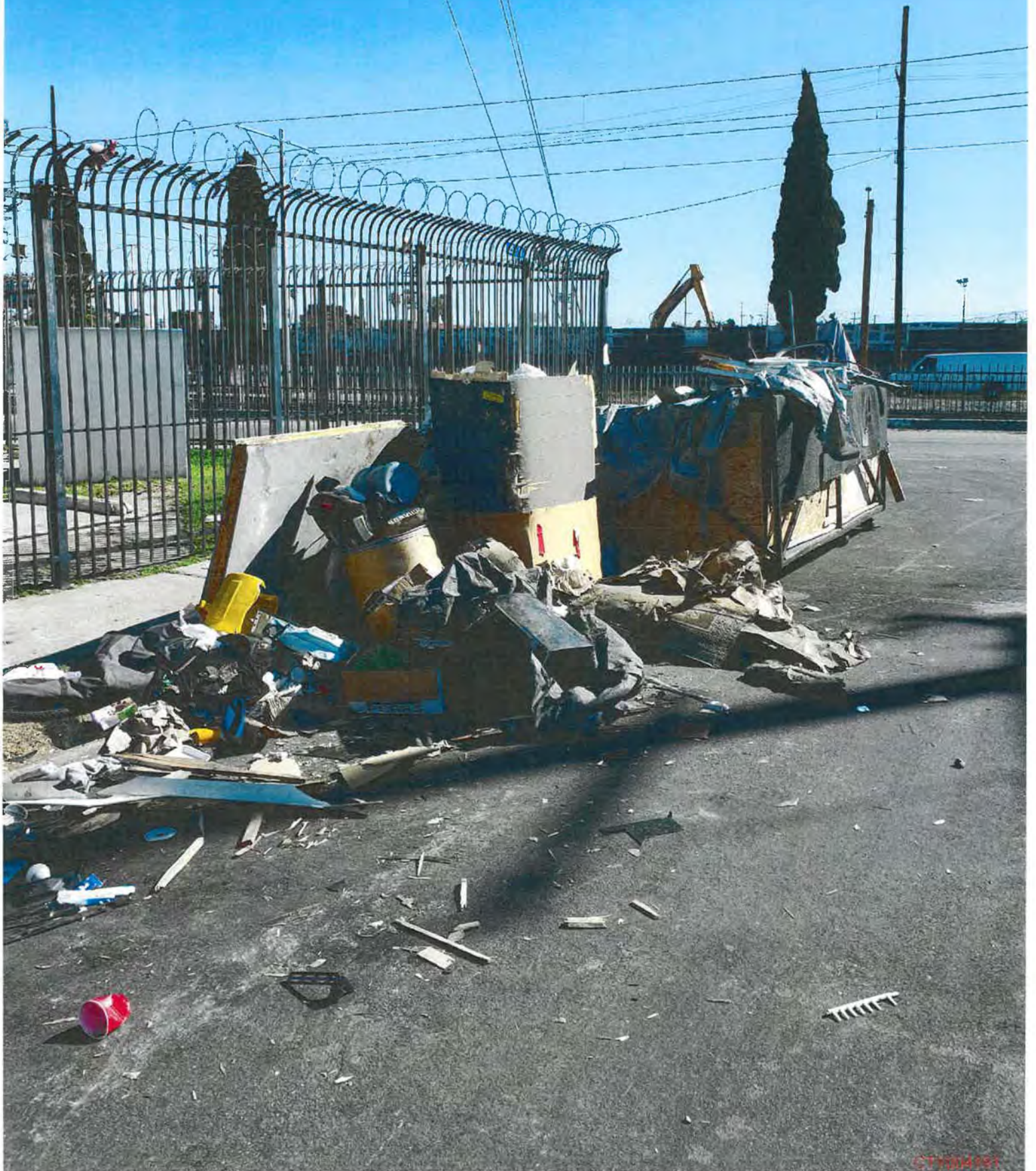




EXHIBIT 14













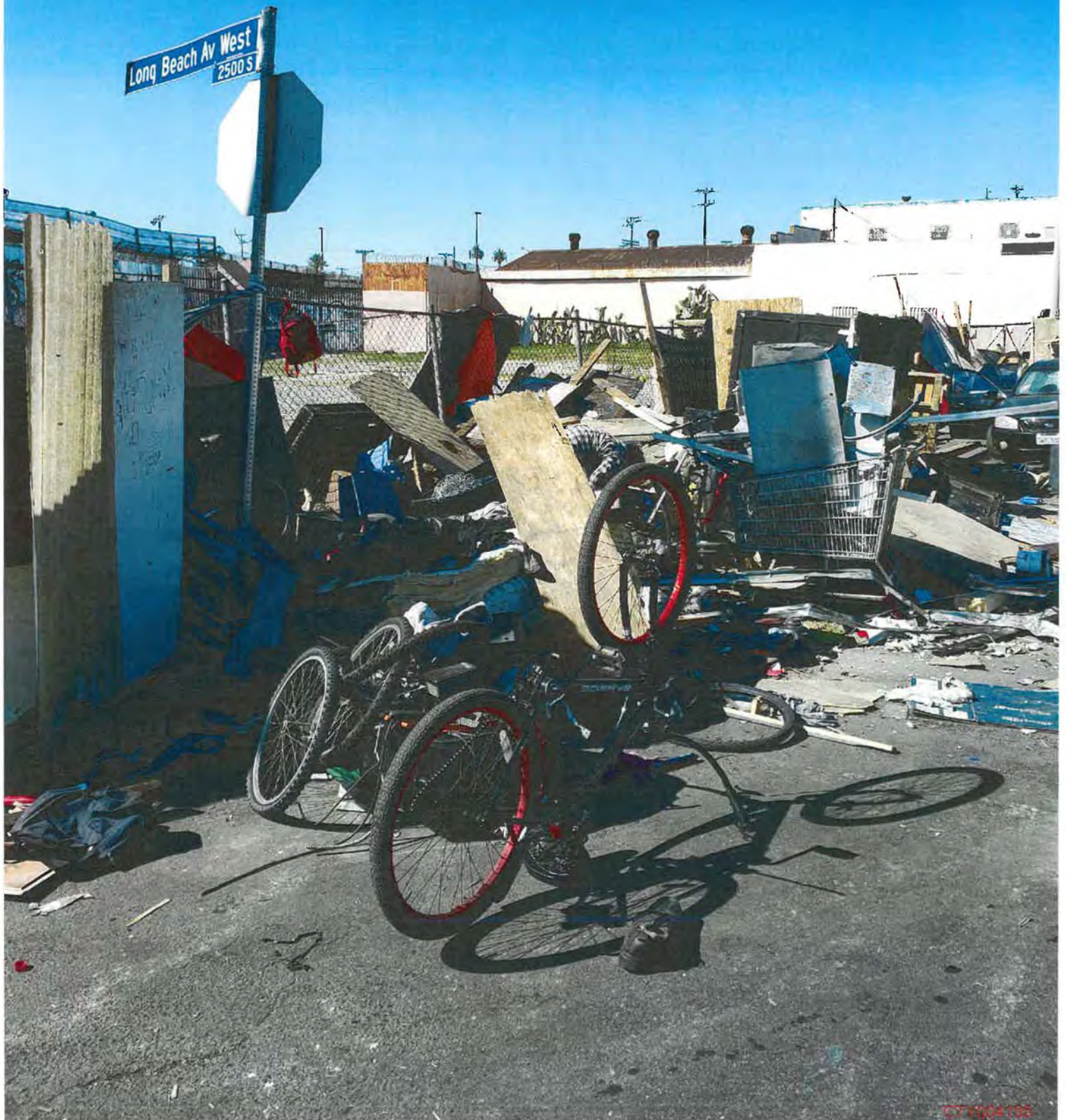


EXHIBIT 15



CTY004196



CTV004187



EXHIBIT 16





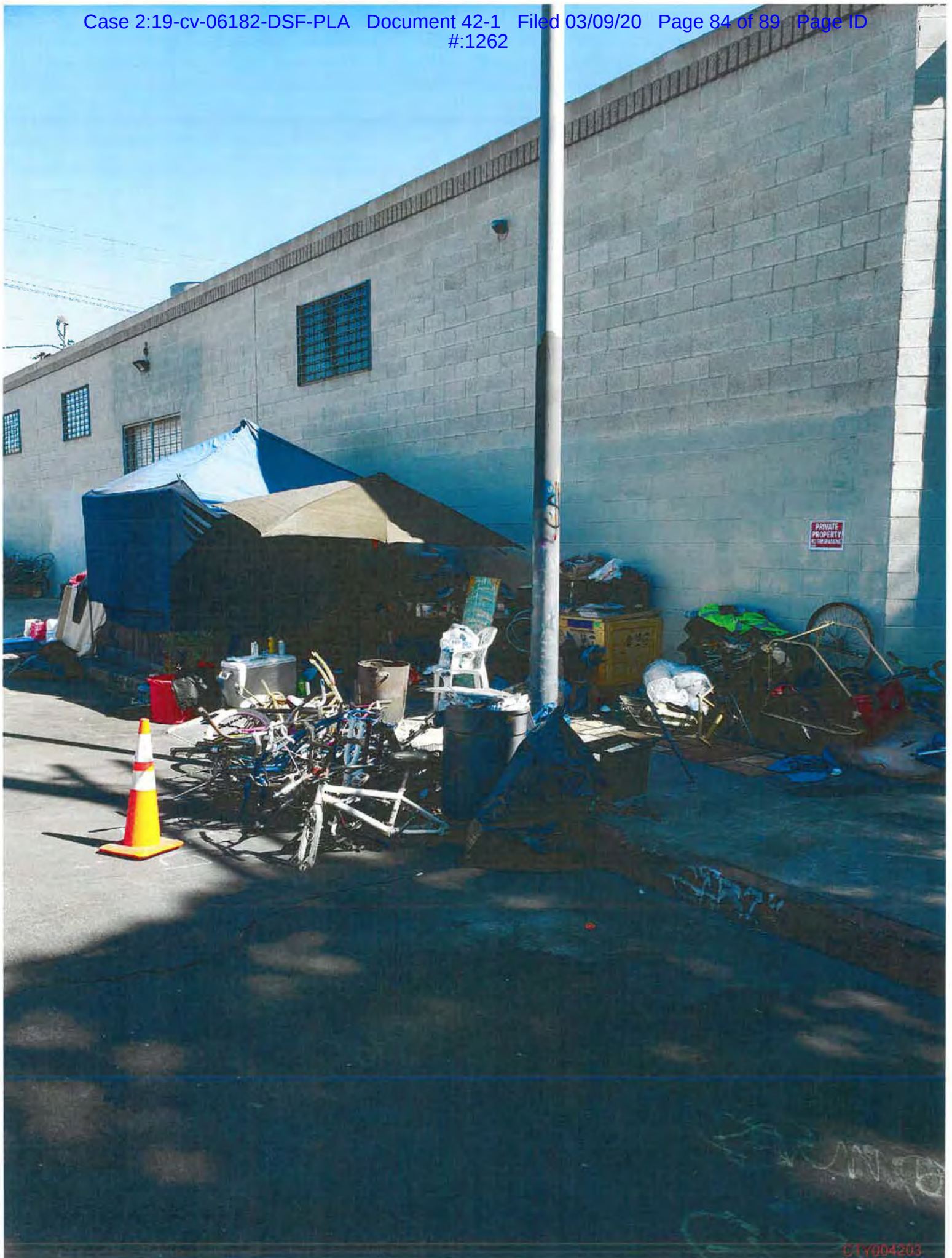


CTY004201

EXHIBIT 17



EXHIBIT 18







CTY004205



CTV004206

